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July 24, 2015

**VIA E-MAIL TRANSMISSION
AND ECF FILING**

The Honorable Robert E. Gerber
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004

**Re: In re Motors Liquidation Company, et al.
Case No. 09-50026 (REG)**

Letter Regarding Update on Related Proceedings

Dear Judge Gerber:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC (“**New GM**”) in the above-referenced matter. Pursuant to Your Honor’s Endorsed Order dated May 5, 2015 [Dkt. No. 13131], we write to update the Court regarding developments in proceedings relating to New GM’s Motions to Enforce. Specifically,

1. On July 21, 2015, the plaintiff in *Pillars v. General Motors LLC*, Case No. 1:15-cv-11360-TLL-PTM (E.D. Mi.) (“**Pillars Lawsuit**”), which is pending in the United States District Court for the Eastern District of Michigan (“**Michigan District Court**”), filed a response (“**Pillars Response**”) to *Defendant General Motors LLC’s Motion For Leave To File Amended Notice Of Removal And Amended Answer* (“**Motion to Amend**”).¹ On July 23, 2015, New GM filed its reply to the Pillars Response with the Michigan District Court, as well as a *Motion to Extend Page Limit*. Copies of these pleadings are annexed hereto as Exhibits “1” through “3” respectively.

¹ A copy of the Motion to Amend was attached to New GM’s letter to the Court dated July 20, 2015 [Dkt. No. 13308].

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2. On July 23, 2015, the following pleadings or other documents were filed:

- a. New GM filed with the United States District Court for the Southern District of New York ("**District Court**") its memorandum of law in opposition to the motion to withdraw the reference with respect to the No Strike Pleadings filed by the State of California and the State of Arizona.
- b. New GM filed with the District Court its memorandum of law in opposition to the motion to withdraw the reference with respect to the No Strike/Objection Pleading filed by Designated Counsel.
- c. New GM filed with the Second Circuit a letter with respect to the pending petitions and cross-petitions seeking a direct appeal to that Court of the Judgment dated June 1, 2015, informing it of, among other things, this Court's *Decision And Order On Bledsoe Plaintiffs' Reargument And Other Post-Judgment Motions*, entered on July 22, 2015 ("**Bledsoe Decision**").
- d. Gary Peller filed a letter with the Second Circuit informing it of the Bledsoe Decision.
- e. Designated Counsel filed with the District Court a letter regarding the proposed stipulation and order submitted to this Court regarding the request to toll the portion of Designated Counsel's Omnibus Judgment Pleading that concerns the GUC Trust Asset Pleading.

Copies of the pleadings referenced in Paragraphs 2(a) through (e) are attached hereto as Exhibits "4" through "8" respectively.

Respectfully submitted,

/s/ Scott Davidson

Scott Davidson

AJS/sd
Encl.

cc: Gary Peller
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